

CPSC MEETING LOG UPHOLSTERED FURNITURE

CPSC 6-11-01 Cleared
No Mkt./Priv. Lgts.
Products Identified
Excepted by
Selling Not
Commissioner's Order

2002 APR -1 12 3 42

Meeting Between: CPSC staff and representatives of the Business & Institutional Furniture Manufacturers Association (BIFMA) Flammability Standard Subcommittee

Date of Meeting: March 4, 2002

Meeting Site: Sheraton Four Seasons Hotel, Greensboro, NC

Log Entry By: Dale R. Ray, Project Mgr., EC, (301) 504-0962 x1323 *DRay*

Participants: Richard Driscoll, BIFMA Executive Director
Cindy Schaaf, K-I, Committee Chairperson
Randy Ruster, Herman Miller Co., past Chair
Joe Ziolkowski, Upholstered Furniture Action Council
Pamela Rivette, California Bureau of Home Furnishings
John McCormack, California Bureau of Home Furnishings
Dale Ray, CPSC
Plus about 20 BIFMA member company representatives


Summary:

This meeting of the BIFMA Flammability Committee was held in conjunction with the American Furniture Manufacturers (AFMA) flammability workshop. BIFMA members produce or supply components for contract-market and other commercial furniture. Most of their products are distributed for non-residential use, although some may be sold to consumers. BIFMA members' products are generally designed to meet California Technical Bulletin 117. BIFMA's meeting agenda is attached.

The committee members discussed flammability standards activities of CPSC, the California Bureau of Home Furnishings & Thermal Insulation (BHF), ASTM, NFPA, Underwriters Laboratories, and the furniture industry (AFMA/UFAC). Mr. Ziolkowski presented a report on UFAC's activities in the furniture industry's Small Open Flame Technical Committee (SOFTC).

Mr. McCormack and Ms. Rivette presented information on the recently-released revised draft of California Technical Bulletin 117, the basis for existing mandatory regulations for all upholstered furniture sold in that state. They said they expected to initiate rulemaking toward a possible amendment in the Fall of 2002, with a target for final amendments by Fall 2003.

Mr. Ray presented an update of CPSC's work to develop a small open flame standard, and discussed the information in the October 2001 CPSC staff briefing package.



An outline and discussion guide of the briefing package information is attached. There was some discussion about how CPSC's draft standard compared with the latest draft of the revised TB-117. The BIFMA members expressed some uncertainty about whether they would continue to offer products nationwide that met a revised TB-117, but many said they would continue to do so. Mr. Ray invited BIFMA to participate in the upcoming public meeting at CPSC on upholstered furniture-related issues.

There was additional discussion of the status of BIFMA's X5.7 cigarette ignition voluntary guidelines, which had not been revised since 1991. The group decided to begin phasing out this standard on the basis that it was obsolete and redundant.

attachments



The Industry Voice for Workplace Solutions

**FLAMMABILITY STANDARD SUBCOMMITTEE MEETING
MARCH 4, 2002 - SHERATON FOUR SEASONS - GREENSBORO, NC**

BEGIN: 1:00 PM

1. INTRODUCTIONS: Members and Guests
 - a. Joe Ziolkowski AFMA
 - b. Mr. John McCormack CAL BHFTI
 - c. Ms. Pamela Rivette CAL BHFTI
 - d. Mr. Dale Ray CPSC
2. Confirmation of Cindy Schaaf, KI as Chairperson
3. REVIEW & APPROVAL OF PREVIOUS MINUTES: March 5, 2001
4. Report from Joe Ziolkowski:
 - a. AFMA activities
 - b. SOFTC
 - c. ATMI
5. BHFTI - Update on activities: Mr. John McCormack & Ms. Rivette
 - a. CAL TB 117 Draft (2/2002) review
6. Report by Mr. Dale Ray - Consumer Product Safety Commission
 - a. Project on Upholstered Furniture Flammability: review/status
 - b. Polyurethane labeling update
7. BIFMA phasing out Flammability Standard X5.7-1991
 - a. Review Fire Test Resources Guide (Sleep Products Safety Council)
8. Other Items: NFPA 260, 261, 265
9. UL Office and Commercial Seating
 - a. Application of CA TB-117 and CA TB-133
10. NEXT MEETING: Location and Date
Same venue as AFMA Flammability Conference 2003
11. ADJOURN: 4:00 PM
Note: AFMA will sponsor a reception 6:00 PM to 7:30 PM at the Sheraton Four Seasons Hotel. All meeting attendees are invited to attend.



U.S. CONSUMER PRODUCT SAFETY COMMISSION STAFF BRIEFING PACKAGE ON UPHOLSTERED FURNITURE*

November 2001

**Contact: Dale Ray, Project Mgr.
Ph: 301-504-0962 ext. 1323
Fax: 301-504-0109
e-mail: dray@cpsc.gov**

1. October 2001 Briefing Package

- Presents CPSC technical information**
- Revised draft small open flame standard**
- Staff recommendation: publicize info, get public feedback before considering regulatory options under small open flame proceeding**
- Staff recommendation: deny polyurethane foam petition**
- NASFM petition withdrawal**

2. The Continuing Fire Hazard

- Leading cause of fire deaths of any consumer product**
- 1998 addressable fire losses: 420 deaths, 1,080 injuries, \$120 million property damage**
- 1998 estimated societal costs = \$2.4 billion**
- Still no national standard addressing the open flame risk**

3. CPSC Testing & Analysis

- Establishes technical feasibility of a small open flame standard**
- Evaluate new product innovations**
- Basis for projected benefits of a standard**
- Information base to share with manufacturers, state / local / international regulators**

***The information presented in this document was prepared by the CPSC staff, and does not necessarily represent the views of the Commission.**

This document is in the public domain, and may be freely copied or reprinted. The CPSC briefing package is available on-line at: <http://www.cpsc.gov/library/foia/foia02/brief/briefing.html>

4. Highlights of the Draft Small Open Flame Standard

--Objective: evaluate and reduce ignitability and flame spread, thereby limiting the early stages of fire growth

--Two basic test locations: seating areas & dust covers (where most ignitions occur)

Small Open Flame Performance Requirements

Test	Ignition Source	Maximum Flaming	Maximum Smoldering/Glowing
Seating Area	Small butane flame, 20 sec.	2 min.*	15 min.
Alternate Seating Barrier	U.K. (BS 5852) Crib #5	10 min.	60 min.**
Dust Cover	Small butane flame, 20 sec.	2 min.*	15 min.

*with no burning to any edge of the test specimen

**with limited spread of combustion of foam filling material, no dripping, and no uncontrolled flaming

--Small open flame tests:

Combinations of FR seating materials, including fabrics, generally necessary;
FR fillings or self-extinguishing interliners may be used, but not required;
Nonwoven dust covers generally necessary.

--Optional seating barrier test:

Fire-blocking barriers generally necessary; FR fabrics not needed.
Provides adequate level of safety while maintaining fabric choice.

--Sampling plan for establishing compliance for fabrics / barriers:

Similar to children's sleepwear regulations; 3 levels

Fabric / Barrier Sampling Requirements

Sampling Level	# Samples (@ 4 specimens each)	Production Unit (max. # lin. yds.)*
Initial	3	1,000
Normal	2	5,000
Reduced	2	10,000

*Multiple smaller runs may be tested together; short runs < 50 lin. yds. exempt.

Initial Sampling: products for which compliance is undetermined

Normal Sampling: products consistently passing initial sampling tests

Reduced Sampling: products consistently passing normal sampling tests

--Recordkeeping to establish information trail for finished products;

allows manufacturers, importers & suppliers to identify sources of materials

5. Economic Issues

- Evaluates significant available alternatives; provides basis for reducing potential economic burden, especially on small firms**
- CPSC staff analysis revised to consider issues raised in industry studies, reflect latest version of draft standard**
- A small open flame standard would have net benefits to the public**

6. FR Chemical Risk Assessment

- Toxicity reviews of 16 candidate chemical categories under FHSA**
- Evaluated risk for 8 compounds (not same as NAS 8):**
 - No hazard: 4 compounds (DBDPO, HBCD, CPE, PA);**
 - Probably no hazard: 1 compound (EHDP);**
 - Chronic hazard: 1 compound (TDCP);**
 - Incomplete data: 2 compounds**
 - AT (inhalation route only)**
 - THPC (identity / toxicity of migration products)**
 - CPSC staff working with manufacturers to develop additional data**
- EU risk assessment: risk for lower BFRs; "precautionary principle" for higher BFRs**

7. Progress On Other Standards Activities

- ASTM E5.15: no action on test method, working with SOFTC**
- SOFTC: continuing research to develop mass loss test method**
- Industry research to develop more fire-resistant products**
- California BHF: upcoming proposal to revise TB-117, possible composite & component requirements on small open flame**

8. Conclusions

- Available information suggests a small open flame standard is technically & economically feasible**
- CPSC briefing package presents government research, requests public input before staff makes recommendations to Commission on regulatory options**
- Possible Public Meeting: early – mid 2002**
- Challenges to industry following August 2000 Position Statements:**
 - a. Develop products and materials for residential upholstered furniture**
 - b. Commitment to participation in developing a national standard**